

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

**RONDA RACCA, Individually and  
on behalf of all similarly situated  
persons,**

**Plaintiffs,**

**VS.**

**Case No.** \_\_\_\_\_

**EFG GENERAL PARTNER CORP.;  
EDUCATION FUTURES  
MANAGEMENT, COMPANY;  
EDUCATION FUTURES GROUP, LLC  
COMPUTER CAREER CENTER, L.P.  
d/b/a VISTA COLLEGE; PROSPECT  
PARTNERS, LLC; JIM TOLBERT;  
MICHAEL McINERNEY and LOUIS  
KENTER,**

## Defendants.

## DECLARATION OF LOUIS KENTER IN SUPPORT OF NOTICE OF REMOVAL

**I, Louis Kenter, declare:**

1. My name is Louis Kenter. I am named as one of the Defendants in the above-styled action. I am over 21 years old and have personal knowledge of the information in this Declaration. If called to testify, I would and could competently testify to the facts in this Declaration.

2. I founded Prospect Partners, LLC in or around 1998. My duties at Prospect Partners, LLC include investing in and advising companies across a broad range of niche manufacturing, distribution, and specialty service markets.

3. I currently reside full time at 3434 Gin Lane in Naples, Florida, 34102. I currently have no plans to move my permanent residence from Florida.

I declare under penalty of perjury under the laws of the States of Texas and Florida, and the laws of the United States of America, that the foregoing is true and correct.

Dated: March 16, 2022

By: \_\_\_\_\_

Louis Kenter